

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

JAMON N. HESTAND

PLAINTIFF

V.

§ Case No.

OFFICE OF THE INSPECTOR GENERAL,
O.I.G. OFFICER - CURTIS D. BITZ / Candace Stevick
Several Unknown O.I.G. Officers, / CANDACE STEVICK
Unknown O.I.G. Investigator: I-0964,
TEXAS DEPARTMENT OF CRIMINAL JUSTICE - Correctional
Institutions Division,
Major - JAMADRE L. ENGE,
Correctional Officer - BARBRA C. NEAL,
Lt. WILLIAM T. MULLINS,
C.O. - MICHAEL O. CASTEEL,
C.O. - IAN DAVIS,
C.O. - MARCELINDO D. NAJERA AGUILAR,
C.O. - LOURENS A. JACKSON,
Sgt. - KIMBERLYN D. THOMPSON,
3 Unknown Correctional Officers for 2-13-2018,
Registered Nurse - ROBERT GAGE,
Mental Health Clinician - ALISON TRAVIS,
Unit Grievance Investigator - BRITTANI F. RODRIGUEZ,
LGI - MELISSA B. VIXTHA,
Practice Manager - PAM PACE,
Central Grievance Officer "Unknown" - IO352,
Warden - CHARLES O. MEADOR,
Warden - DEBORAH G. COCKRELL,
Warden - PENNIE R. KEMPT,
LGI Supervisor - MARGARET M. PRICE,
Doctor - GARY WRIGHT,
Doctor - DAVID STEBBINS,
LGI - TAMMY L. RAINEY,
Warden - CAROLE MONROE JR.,
CGO - B. BARNETT,

CID Director of TDCJ-CID-BOBBY LUMPKIN, ^{Bryan Collier}
 TDCJ-CID Executive Director-BRIAN COLLIER,
 Texas Board of Criminal Justice/Chairman-PATRICK O. DANIEL,
 Mailroom Supervisor-AMY E. Mc CALISTER,
 Sgt.-DAWANDA K. LACY,
 Sgt.-VICTOR Y. AFUN,
 Lt.-ELDRICK D. BIRDOW,
 CGO-M. BLALOCK,
 CGO-B. HOWARD,
 CGO-V. BARROW,
 UGI-MONTE P. NABORS,
 UGI-RACHEL R. ROWLAND,
 UGI Supervisor-JESSICA L. BACK,
 UGI-DAWN M. HUFFMAN,
 UGI Estelle Business Manager-KHARI MOTT,
 UGI-VIVECA M. MATLOCK,
 UGI-HALEI J. KRAWINSKY,
 CGO-JESSICA RILEY,
 CGO-J. SMITH,
 CGO Deputy Director of Religious Services-TIMOTHY C. JONES,
 Mental Health Case Manager-NANNETTE BROCK,
 Major-VERNON L. ALLEN,
 Vice President (UTMB) CMAA-OWEN MURRAY, ^{UNIVERSITY OF TEXAS MEDICAL BRANCH}
 Lt.-GWENDOLYN R. FULLER,
 Counsel Substitute-STEPHANIE P. RANKLIN,
 Capt.-OLIN C. STATHAM Jr.,
 Major-SEAN F. MARSHALL,
 Licensed Vocational Nurse-MARCY MAYHUGH,
 Major-GUILLERMO M. DELEROSA,
 Sgt.-DANIEL R. JETT,
 Capt.-JASON M. GOULD,
 Lt.-SHERRELL D. MCCOY,
 Sgt.-CHASE R. JOHNSON,
 CO-KAMRY D. KINDER,
 LVN-ABIODUN ALADE,
 LVN-TAMMY TARRANT,
 CO-OLUFEMI OLADIPO,
 Lt.-ERIK L. BRANNAN,
 Sgt.-FRANLIN G. NZERIBE,
 CO-COLLINS K. SINTIM,

Unknown Supervisor - March 9th, 2020;

5 Unknown Correctional Officers - March 9th, 2020;

Several Unknown Doctors & Medical Personnel at Hospital Galveston,

Lt.-SHAYNA Mc ARTHUR,

Sgt.-ADESANYA S. ADENIRAN,

CO.-OLLIBUNMI OSEYE,

CO.-OBADINA S. OMOAKA,

CO.-OLAWALE E. OSIBAJO,

CO.-JOMBO K. OJI,

Two Unknown Correctional Officers - April 5th, 2020;

RN-OGHENERUKEVWE EKAYOMA,

LVN-MICHELLE CALHORN,

UGI-ALICIA M. Mc ELYEA,

Capt.-NICHOLAS C. MARTIN,

Lt.-TERRY L. LANE,

On Duty Unknown Staff - April 6th & 7th, 2020;

UGI-BOBBY BURNS,

TBCJ Chairman "Former" - DALE WAINWRIGHT,

UGI-KATHY GRAY,

Medical Doctor - PAUL SHRODE,

LVN- LORI FORTNER,

Provider - TEMITOPE ADAMS,

NC-MICHELLE NORTHCLIFF,

Provider - ROSEMARY OFILI,

LVN-CHERYL LANG,

Nurse Supervisor Outpatient - KATHERINE WERNER,

MHC-PHYLLIS M. HENDERSON,

RN- BROWN at Hospital Galveston,

Warden - TRACY HUTTO,

Several Unknown Medical Personnel at Michael Unit;

Individually and in their Official Capacities,

DEFENDANTS.

I. JURISDICTION & VENUE

1) This is a Civil Action authorized by: 42 USC, Section 1983, 1985, and 1986 & 42 USC §§ 12101, 12111, 12131, and 12181 "ADA" to redress the deprivation, under color of State law, of rights secured by
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the Constitution of the United States. The Court has Jurisdiction under 28 USC Section 1331 and 1343(a)(3) along with 28 USC Section 1332(a)(2), (c)(1)(A)(B)(C) and 28 USC Section 1361 & 1367(a). Plaintiff seeks Declaratory Relief pursuant to 28 USC Section 2201 and 2202. Plaintiff's claims for Injunctive Relief are authorized by 28 USC Section 2283 & 2284 and Rule 65 of the Federal Rules of Civil Procedure. The Court is authorized to join the Claims and Parties in this Complaint together in this Complaint under Rules 18, 19, 20, 21, 42, and 82 of the Federal Rules of Civil Procedure.

2) The United States District Court - Eastern District of Texas is an appropriate Venue under 28 USC Section 1391(b)(2) because it is where most of the events giving rise to these claims occurred.

II. PLAINTIFF

3) Plaintiff, JAMON NATHANIEL HESTAND, is and was at all times mentioned herein a prisoner of the State of Texas in the custody of the Texas Department of Criminal Justice - Correctional Institutions Division. He is currently confined in Michael Unit, in Tennessee Colony, Texas USA.

III. DEFENDANTS

4) Office of the Inspector General - P.O. Box 4003; Huntsville, Texas 77342

5) O.I.G. Officer - Curtis D. Bitz - 2664 FM 2054; Tennessee Colony, Texas 75886 / Kenedy, TX 78149 /
OIG Officer - Candace Stenick

6) Several Unknown O.I.G. Officers - 2664 FM 2054 - P.O. Box 4003
Tennessee Colony, TX 75886 / Huntsville, TX 77342

7) Unknown OIG Investigator I-0964 - P.O. Box 4003; Huntsville, TX 77342

8) Texas Department of Criminal Justice - Austin, TX 78701 - CID

9) Major-Jamadre L. Enge - Route 1, Box 150; Tennessee Colony, TX 75884

10) CO-Barbra C. Neal - 2664 FM 2054; Tennessee Colony, TX 75886

11) Lt. William T. Mullins - 2664 FM 2054; Tennessee Colony, TX 75886

12) CO-Michael O. Casteel - 2664 FM 2054; Tennessee Colony, TX 75886

13) CO-Ian Davis - 2664 FM 2054; Tennessee Colony, TX 75886

14) CO-Marcelindo D. Najeraquilar - Tennessee Colony, TX 75886

15) CO-Laurens A. Jackson - Tennessee Colony, TX 75886

- 16) Kimberly D. Thompson - 2664 FM 2054; Tennessee Colony, TX 75886
- 17) Unknown C.O.s 2-13-2018 - 2664 FM 2054; Tennessee Colony, TX 75886
- 18) RN - Robert Gage - 2664 FM 2054; Tennessee Colony, TX 75886
- 19) MHC - Alison Travis - 2664 FM 2054; Tennessee Colony, TX 75886
- 20) UGI - Brittani E. Rodriguez - 2664 FM 2054; Tennessee Colony, TX 75886
- 21) UGI - Melissa B. Vixha - 2664 FM 2054; Tenn. Colony, TX 75886
- 22) PM - Pam Pace - 2664 FM 2054; Tenn. Colony, TX 75886
- 23) Unknown CGO - ID 332 - Huntsville, TX 77320
- 24) Warden - Charles O. Meador - 2664 FM 2054; Tenn. Colony, TX 75886
- 25) Warden - Deborah G. Cockrell - 2664 FM 2054; Tenn. Colony, TX 75886
- 26) Warden - Pennie R. Kempt - 2664 FM 2054; Tenn. Colony, TX 75886
- 27) UGI Supervisor - Margaret M. Price - 2664 FM 2054; Tenn. Colony, TX 75886
- 28) Doctor - Gary Wright - 2664 FM 2054; Tenn. Colony, TX 75886
- 29) Doctor - David Stebbins - 2664 FM 2054; Tenn. Colony, TX 75886
- 30) UGI - Tammy L. Ralney - 2664 FM 2054; Tenn. Colony, TX 75886
- 31) Warden - Carol E. Monroe - 2664 FM 2054; Tenn. Colony, TX 75886
- 32) CGO - B. Barnett - Huntsville, TX 77320
- 33) CID Director of TDCJ-CID - Bobby Lumpkin - Huntsville, TX 77320
- 34) TDCJ-CID Executive Director - Bryan Collier - Huntsville, TX 77320
- 35) TBCJ/Chairman - Patrick O. Daniel - Austin, TX 78711
- 36) Mailroom Supervisor - Amy McCalister - 2664 FM 2054; Tenn. Colony, TX 75886
- 37) Sgt. Dawanda K. Lacy - 2664 FM 2054; Tenn. Colony, TX 75886
- 38) Sgt. Victor Y. Afun - 2664 FM 2054; Tenn. Colony, TX 75886
- 39) Lt. Eldrick D. Birdow - 2664 FM 2054; Tenn. Colony, TX 75886
- 40) CGO - M. Blalock - Huntsville, TX ~~75886~~ 77320
- 41) CGO - B. Howard - Huntsville, TX 77320
- 42) CGO - V. Barrow - Huntsville, TX 77320
- 43) UGI - Monte P. Nabors - 2664 FM 2054; Tenn. Colony, TX 75886
- 44) UGI - Rachel R. Rowland - 2664 FM 2054; Tenn. Colony, TX 75886
- 45) UGI Supervisor - Jessica L. Back - 264 FM 3478; Huntsville, TX 77320
- 46) UGI - Dawn M. Huffman - 264 FM 3478; Huntsville, TX 77320
- 47) UGI - Estelle Business Manager - Khari Mott - 264 FM 3478; Huntsville, TX 77320
- 48) UGI - Viveca M. Matlock - 2664 FM 2054; Tenn. Colony, TX 75886
- 49) UGI - Halei J. Klawinsky - 264 FM 3478; Huntsville, TX 77320
- 50) CGO - Jessica Riley - Huntsville, TX 77320
- 51) CGO - J. Smith - Huntsville, TX 77320
- 52) CGO - Timothy C. Jones - Huntsville, TX 77320
- 53) MHCM - Nannette Brock - 2664 FM 2054; Tennessee Colony, TX 75886
- 54) Major - Vernon L. Allen - 2664 FM 2054; Tenn. Colony, TX 75886

- 55) Vice President ~~UTMB~~ CMAA - Owen Murray - Huntsville, TX 77340
- 56) Lt. - Gwendolyn R. Fuller - 2664 FM 2054; Tenn. Colony, TX 75886
- 57) Counsel Substitute - Stephanie P. Ranklin - 2664 FM 2054; Tenn. Colony, TX 75886
- 58) Captain - Olin C. Statham Jr. - 2664 FM 2054; Tenn. Colony, TX 75886
- 59) Major - Sean F. Marshall - 2664 FM 2054; Tenn. Colony, TX 75886
- 60) LVN - Marcy Mayhugh - 2664 FM 2054; Tennessee Colony, TX 75886
- 61) Major - Guillermo M. Delerosa - 2664 FM 2054; Tenn. Colony, TX 75886
- 62) Sgt. - Daniel R. Jett - 2664 FM 2054; Tenn. Colony, TX 75886
- 63) Captain - Jason M. Gould - 2664 FM 2054; Tenn. Colony, TX 75886
- 64) Lt. - Shemel D. McCoy - 2664 FM 2054; Tenn. Colony, TX 75886
- 65) Sgt. - Chase R. Johnson - 2664 FM 2054; Tenn. Colony, TX 75886
- 66) C.O. - Kamry D. Kinder - 2664 FM 2054; Tenn. Colony, TX 75886
- 67) LVN - Abiodun Alade - 2664 FM 2054; Tenn. Colony, TX 75886
- 68) LVN - Tammy Tarrant - 2664 FM 2054; Tenn. Colony, TX 75886
- 69) C.O. - Oluwemi Okadipo - 2664 FM 2054; Tenn. Colony, TX 75886
- 70) Lt. - Erik L. Brannon - 2664 FM 2054; Tenn. Colony, TX 75886
- 71) Sgt. - Franklin G. Nzeribe - 2664 FM 2054; Tenn. Colony, TX 75886
- 72) C.O. - Collins K. Sinfim - 2664 FM 2054; Tenn. Colony, TX 75886
- 73) Unknown Supervisor "March 4th, 2020" - 2664 FM 2054; Tenn. Colony, TX 75886
- 74) 5 Unknown Correctional Officers "March 4th, 2020" - 2664 FM 2054; Tenn. Colony, TX 75886
- 75) Several Unknown Doctors & Medical Personnel - Galveston, TX 77550
- 76) Lt. - Shayna McArthur - 2664 FM 2054; Tennessee Colony, TX 75886
- 77) Sgt. - Adesanya S. Adeniran - 2664 FM 2054; Tennessee Colony, TX 75886
- 78) CO - Olubunmi Oseye - 2664 FM 2054; Tenn. Colony, TX 75886
- 79) CO - Obadina S. Ompaka - 2664 FM 2054; Tenn. Colony, TX 75886
- 80) CO - Olawale E. Osibajo - 2664 FM 2054; Tenn. Colony, TX 75886
- 81) CO - Jombo K. Oji - 2664 FM 2054; Tenn. Colony, TX 75886
- 82) Two Unknown Correctional Officers "April 5th, 2020" - Tenn. Colony, TX 75886
- 83) Registered Nurse - Oghenerukwe Ekayama - Tenn. Colony, TX 75886
- 84) LVN - Michelle Calhorn - Tennessee Colony, TX 75886
- 85) UGI - Alicia M. McElyea - Tenn. Colony, TX 75886
- 86) Captain - Nicholas C. Martin - Tenn. Colony, TX 75886
- 87) Lt. - Terry L. Lane - Tenn. Colony, TX 75886
- 88) On duty Unknown Staff "April 6th & 7th, 2020" - Tenn. Colony, TX 75886
- 89) UGI - Bobby Burns - Tennessee Colony, TX 75886
- 90) TBCJ/Chairman "Farmer" - Dale Wainwright - Austin, TX 78711
- 91) UGI - Kathy Grey - Tenn. Colony, TX 75886
- 92) Medical Doctor - Paul Shrade - Tenn. Colony, TX 75886
- 93) LVN - Lori Fortner - Tenn. Colony, TX 75886

- 94) Provider Medical - Terri Toppe Adams - 264 FM 3478; Huntsville, TX 77320
- 95) NC - Michelle Northcutt - 264 FM 3478; Huntsville, TX 77320
- 96) Medical Provider - Rosemary O'Reilly - 2664 FM 2054; Tenn. Colony, TX 75886
- 97) LVN - Cheryl Lang - Huntsville, TX 77320
- 98) Nurse Supervisor Outpatient - Katherine Werner - Huntsville, TX 75886
- 99) MHC - Phyllis M. Henderson - Tenn. Colony, TX 75886
- 100) RN - Brown - Hospital Galveston, Galveston, TX 77550
- 101) Warden - Tracy Hutto - 264 FM 3478; Huntsville, TX 77320
- 102) Several Unknown Medical Personnel at Michael Chert - Tenn. Colony, TX 75886

103) Each defendant is sued individually and in their official capacity. At all times mentioned in this complaint, each defendant acted under color of state law.

III. FACTS

104) First of all; I, Jamon Nathaniel Hestand the Plaintiff of this case, have been in Solitary Confinement since July 11th, 2011 where I was placed in retaliation for me trying to obtain relief & my Victims Rights for an actual felony assault & battery with serious bodily injury where Correctional Officer Marcos M. Perez hit me in my upper forehead on the left side spilling my blood with a riot baton with me in handcuffs behind my back on September 10th, 2010 at Connolly Unit and I was denied medical care. In reference to Grievance #2011008113 there was an Office of the Inspector General investigation where I did in fact pass a Polygraph Test with the State Polygraph Examiner and I really thought I was going to get some relief and have my Victims Rights fulfilled but I never heard another word about it all the way up to December 8th, 2011 when all the sudden I was pulled out of my cell to speak with O.I.G. Officer Condace^{SR} Stervick only a day after another very serious incident where CO Marcos M. Perez deliberately instigated a very violent illegal Use of Force against me implemented by his friend & coworker Marcus Keller the Lt. and several subordinates who sprayed me with chemical agents so badly (with me completely naked trying to comply with orders) that you could barely tell what color my skin was anymore on my entire body regardless of me asking them to stop torturing me --- they used 3 whole Cans of gas on me. Then, when they finally let me submit to handcuffs and told me to kneel down by the toilet facing away from them and they opened the cell door, ran in and stomped me flat from behind so my head bounced on the concrete and they (a 5 man team) proceeded to stomp & kick me relentlessly and punching me in my face repeatedly hurting me badly. and they of course denied me medical care.

and dragged me from 12 building E-Pod 51 cell to E-Pod 7 cell where I was left face down on the ground unconscious. I regained consciousness hours later.

So when I got pulled out the next day on 12-8-2011^{m d y} to speak with OIG Officer Candace Sterick, she sees me completely orange from chemical agents so strong that she was coughing & sneezing from being in a large room with me and she saw actual boot prints all over my legs & back & arms from being stomped on and she took digital photographs as evidence and questioned me and let me know that the original OIG Officer that was investigating the incident with CO-Marcos Perez, passed away and the case was given to her and I was told that he was never supposed to be near me. I explained to her about all the retaliation I had faced since the incident with him on 9-10-2010 and gave her evidence of another very vicious illegal use of force against me on September 9th, 2011 which is as follows:

It involved retaliation from Prison Officials & Staff that I didn't even know making fake claims and refusing me shower and denying me my food that led to the illegal use of force on 9-9-2011 where I was sprayed badly with chemical agents and then ran in on at Connally Unit 12 Building E-Pod 68 cell and smashed to the ground, and beaten without mercy by CO-Rodolfo Ruiz / CO-Seaford / CO-Ramirez / CO-Juan Leal / and others under the authority of Capt. Almendarez, Lt. Bohman, and Sgt. Rosales --- I was choked with a sock to the point of unconsciousness and had my face punched and slammed into the concrete a bunch of times busting my head & face open in several places spilling my blood everywhere under me while others (besides Rodolfo Ruiz doing the first part) stomped on me, jammed fingers in my eyes, tried to break my thumbs, and Juan Leal reaching into my underwear crushing / squeezing / yanking / ripping my testicles ruthlessly sexually violating me --- this torture went on so long that I passed on my self and when they finally pulled me out of the cell I was covered in blood and taken to 12 E-20 cell and was denied medical care by Nurse K. Green completely.

By the time I spoke with OIG Officer Candace Sterick³⁹, all these Prison Officials & Staff involved in the forementioned incidents including the Grievances Investigators who violated the Grievances connected to those events, all knew that I was severely mentally ill and that my mental illness definitely adversely affected my major life activities which was well documented so that OIG Officer Candace Sterick knew also for sure and at first I really thought that I was going to get some relief from her and have my Victims Rights fulfilled finally by her & OIG but instead what I got was this dirty 2
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Corrupt O.I.G. Officer Candace Sterick^{SP} conspiring against my rights with the forementioned Prison Officials & Staff and others unknown (along with a Major J. Childs who she had a relationship with to the best of my knowledge and who was the Major over 12 Building where I was) to: Obstruct Justice on purpose for the heaping pile of felony crimes committed against me as forementioned such as: Conspiracy Against my Rights/Obstruction of Justice/FALSE STATEMENTS/Perjury/Torture/Assault & Battery with Serious Bodily Injury/Sexual Assault & Battery with Serious Bodily Injury/Abuse of Office/Official Oppression/Deadly Conduct/etc..

From that time forward from her evil against me I suffered in pain & misery and I face immense retaliation & harassment from these related Prison Officials & Staff to the forementioned events and I was told by many of them that OIG Officer Candace Sterick told them that she wasn't going to do anything to them at all and she never did. I tried to write OIG many times to no avail and my life was threatened by many of these Prison Staff along with my family with such threats as: beating me to death/hanging me in my cell vent/prisoning my food/raping my family or killing them/raping me with tray slot bars/etc.etc, if I tried to file a lawsuit or talk to the Police.

Those events literally drove me insane to the point where I began hurting myself bad enough to be sent to the freeworld hospital and to Jester 4 Psychiatric Unit many times trying to escape the abuse & madness being perpetrated against me at Connally Unit. For many long terrible years and sadly I was also hurt very badly at Jester 4 also on December 10th, 2014 when I was subjected to a Use of Force where I was beaten viciously while naked by a 5 man team where a Staff member who was not even on the team at all, ran in the cell and held my right leg so another could stomp my knee into the concrete breaking it and tearing the Meniscus with it and I was denied medical attention on purpose and left in screaming agony of intense pain in a cell of concrete with a hole in the ground yelling and begging for help for over 16 hours before ever getting any help at all.

Every Grievance I wrote about that Use of Illegal Force on 12-10-2014 vanished every single time and every letter I wrote OIG was ignored relentlessly until I couldn't bear trying anymore... All these Uses of Force are on record and OIG should surely have a record of the Connally Unit Uses of Illegal Force and so should the State ~
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Polygraph Examiner of Texas. There's no legit reason for OIG doing me so viciously and unlawfully whatsoever but they did and they still are!

105.) I, the Plaintiff, have been in Solitary Confinement since July 11th, 2011 being tortured relentlessly where I am trapped in a cell for over 22 hours a day for over 15 days "alone" all the way til now & ongoing which has & is making my disabilities worse & worse & worse which adversely affects my ability to interact with others properly / my ability to control my behavior so that I am a threat to myself & others / my ability to exercise regularly / my ability to take care of my personal hygiene / my ability to trust anyone at all / my ability to eat clean food / my ability to concentrate properly / my ability to be rehabilitated physically & mentally / my ability to deal with any authority figures properly / my desire to live / etc.

106.) I, the Plaintiff, am Chronically Mentally Ill / Severely Mentally Ill and there is an extensive record of this illness / disability on my medical record here in the TDCJ-CID. I am considered to be Chronically Mentally Ill by TDCJ-CID and O.I.G. and I am. My mental illness definitely adversely affect my Major Life Activities on several levels simultaneously. My mental illness is also amplified by my physical disabilities extremely.

I have tried to kill myself multiple times very seriously. I see things continuously that others do not see. I hear things that others do not hear. I deal with flashbacks of all the terrible abuse I've been subjected to by Prison Officials & Staff and OIG Officers & Staff that's so intense that I am actually there again replaying events so that I can't even see my current surroundings and I'm physically involved trying to change the events violently or wonder what would be if I was dead then ~~for~~... I am able to shake it off but having to recap these negative events brings the flashbacks like what I'm forced to do in this Complaint. Aside from that, I deal with deep depression that makes me have suicidal thoughts which has led to actual attempts in the past with in my time tortured in Solitary Confinement. I experience paranoia with a deep distrust of others especially anyone working under color of law directly or indirectly. I have a history of explosive behavior with disruptive, impulse, and conduct disorder where I can become hostile quickly at minor irritants especially in regards to my paranoia issues. The things I see & hear lean towards the supernatural aside from the flashbacks but sometimes they twist together. I keep thinking Prison Officials & Staff are going to hurt me again.

107) I live in continuous physical pain that's not being taken care of 2
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properly at all! My right lower ribs feel like they poke my lung every breath I take adversely affecting my breathing along with a broken right nostril that makes my breathing worse---the ribs I speak of were fractured and healed imperfectly causing me endless pain & suffering. I experience headaches that fluctuate in intensity while I hear a ringing, peircing sound in both ears that never stops but does change in pitch & intensity. My left eye seems to have been damaged a bit by fingers being crammed in it so many times. My entire back from lower to upper is damaged and in endless pain and if I'm not careful with the way I move or way I lay down, it will give out on me where I am unable to stand or walk at all especially the lower back area around the spine and when it happens, it hurts so bad I cry especially on top of all the other injuries & pain. My right knee is forever damaged in continuous pain and my right ankle/foot is damaged in pain and swells up if used too much both of which makes it hard to walk even with my cane especially with my back injured and then my neck is injured and my right shoulder is damaged and feels torn and stays in pain with the right upper arm feels damaged and stays in aching pain, and the right forearm has what feels like damaged tendons or ligaments and then my right hand that I am forced to write with is damaged in several places and has continuous pain and the right thumb pops out of place and is most definitely in continuous pain and it hurts to write and holding a pen causes my hand & fingers & thumb to go numb & tingling and most importantly when I'm trying to hold my cane when I'm walking, I'm applying pressure and my hand goes numb and hurts badly and my entire right arm will hurt more than any other time. My left testicle is forever in continuous pain even after the September 29th, 2020 surgery for the assault & battery "sexual" by Juan Leal. I have broken toes and left middle finger too and something serious wrong on the back of my head where sometimes if I cough or laugh too hard it feels like electricity juice going up my neck to a spot on the upper right side of my head where I had something like a sist cut out of my head at Stevenson Unit. I have bad eyesight but have some old glasses to help. I have high blood pressure on a regular basis. I have chest pain periodically. I feel like theres something in my lungs. I struggle to sleep properly. I stay in serious pain!

108) My physical & mental disabilities combined together simultaneously adversely affect my Major Life Activities very seriously by making it very difficult to walk, stand, and/or sit for very long at all without serious pain. These disabilities make it very hard to see & hear normally and I struggle to concentrate with things always moving around in my vision along &

with the ever ringing peircing noise combined with things others don't hear while I wrestle with Flashbacks that make me lose awareness of my surroundings. Standing too long makes my feet, ankles, and knees hurt badly with swelling especially on the right side so it's painful to walk or stand for very long. It's also difficult to use my cane because of my entire right arm/hand/etc. being injured. I struggle to interact with others especially anyone working directly or indirectly under color of law or authority figures. I am unable to lift any heavy objects without increased pain and increased pain makes me hostile, delusional, very uncooperative, etc.. I am unable to sleep properly because of my injuries & disabilities. Because of my disabilities/injuries, I am unable to control my anger & depression properly like someone that does not have these same disabilities & injuries which have gotten worse & worse over the years of neglect, abuse, and actual Torture I've been subjected to by very corrupt Prison Officials & Staff and OIG Officials & Staff. I have a hard time breathing normally due to my injuries & disabilities. I struggle to write because of pain that gets worse with prolonged use. I will have forever problems with sexual relations and have been having trouble with sexual functions because of my left testicle being damaged from the sexual assault/battery by CO Juan Leal that OIG Officer Candace Stenick covered up illegally. I have a hard time taking care of myself properly due to my disabilities such as with dressing, undressing, taking care of my hygiene issues, etc.. Bending is difficult due to my injuries & disabilities. I am unable to do the work that I have always been good at before I became disabled such as Construction work/Painting Houses & Buildings/Landscaping/etc.. I have problems remembering things properly because of these disabilities & injuries.

The defendants in this Complaint know I am disabled and knew it all along. There is a record of these disabilities although I have not received proper medical care for every disability/injury I named in section 106, 107, and 108 of this Complaint. My disabilities are very serious or major and are continuous or permanent although I hope some of it can be fixed with proper medical care. I don't deserve to be tortured.

109) The State Classification Committee of the TDCJ-CID lied to me at the start of 2017 claiming they were going to send me to the Administrative Segregation Transition Program at the Ramsey Facility to give me a chance to get out of Solitary Confinement/Ad-Seq but instead I was transferred from the hell of Connolly Unit to the nightmare of Michael Unit and from April 2017 up til now I have not been reviewed by SCC properly at all so I have not seen them at all personally and have gotten no chance

to speak to any SCC members whatsoever (of which Dr. David Stebbins takes part with since he is responsible for the Mental Health Therapeutic Diversion Program/Chronically Mentally Ill-Sheltered Housing at Michael Unit) and so I am trapped in this Solitary Confinement Chronically Mentally Ill-Sheltered Housing with no legitimate review by SCC whatsoever in retaliation for me trying to get relief for Human/Civil Rights violations committed against me by a multitude of Prison Officials & Staff as I will explain here shortly in other sections along with what I have already explained so far.

110.) On February 13th, 2018; before lunch time, Captain Jamadre L. Enge and CO-Barbra C. Neal went into my cell at Michael Unit 12-Building A-Pod 78 cell and proceeded to literally tear my property up, throw it all over the cell and place a bunch of it in a large bedding sheet to hide the contents from the cameras ~ after quite some time they finally came out of my cell with a chain bag full of books & magazines and a large bedding sheet bulging full of property. ~ Capt. Jamadre L. Enge said he was taking my things because of an "alleged" fire. I did that never even happened... When I got put back in my cell I noticed a whole bunch of my property missing such as:

Radio-Clock CLTECH serial #04/13/03990 ~ Books: The Millionaire Mind / Awaken the Giant Within by Anthony Robbins / Your Magic Power To Be Rich by Napoleon Hill / Biography of Benjamin Franklin / Biography of Bismark / Unabridged German English Dictionary / 2 Hardback Spanish English Dictionaries / 2 Stone Masonry books / Laying Tile book / Carpentry book / Readers Digest "How To Book" / Modern Magick by Donald M. Kraig / European History Book / Chemistry Textbook / Magic Mountain D2D book / Grateful Dead Special Edition Rolling Stones Mag / Whole Stock of Maximum PC Computer Mags / Hardback Thesaurus, etc.

Also: Gloves / Mirror / Multivitamins / 3/4 Jar of Coffee / Spoon / Light Bulb / 2 pairs of Gym Shorts / Muscle Shirt / Jar of Pomade / AmeriFresh Shampoo / Personal Addresses / etc.

I never received any confiscation papers for any of that property and in fact never got any of that property back at all, so, Capt. Jamadre L. Enge and CO-Barbra C. Neal actually committed Felony theft of my property. And on top of that madness, Capt. Jamadre L. Enge instructed the on duty staff on the Pod not to feed me lunch which they did not... All that ignorance being done to me by the individuals named, agitated my mental illness to

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the far extreme which led me into the illegal excessive Use Of Force at about 2:30pm the same day.

11) On February 13th, 2018 at about 2:30pm at 12 Building A-Pod 78 cell of Michael Unit I did have a little fire going in front of my cell on the concrete in protest of the theft of my property & denial of my lunch food as explained in Section 110 of this Complaint. Very quickly and quite amazingly, Captain Jamadre L. Enge himself came with a firehose to put out the small fire at which point he told me point blank that I am never getting my property back! Within moments with him still there, a group of Staff came already in Use of Force gear/with Use of Force gear to my cell and after much investigation afterwards I know now it was: Captain Jamadre L. Enge, Sgt. William T. Mullins, CO-Kimberlyn D. Thompson, CO-Michael O. Casteel, CO-Ian Davis, CO-Marcelinda D. Najeraaquilar, CO-Lourens A. Jackson, 1 Unknown Correctional Officer, and Registered Nurse-Robert Gage that were all personally involved with the illegal excessive Use of Force they did to me in the "Mental Health Therapeutic Diversion Program/Chronically 'Mentally Ill-Sheltered Housing" where they all knew for a solid fact that I was severely mentally ill far in advance and not only did none of these individuals try to get qualified Psyche Medical Personnel to deal with me properly but to the best of my knowledge, Captain Jamadre L. Enge authorized this illegal excessive Use of force himself that he also personally participated in.

During the use of force, Captain Jamadre L. Enge at about 2:40pm began spraying me with chemical agents thru the cell door in such rapid succession with long sprays each time (which I believe Sgt. Williams T. Mullins also participated in) so that there was absolutely no way at all to follow any orders which didn't make sense at all in themselves especially with my disabilities at the time. That torture went on for awhile before they finally got the cell door open and rushed in with CO-Michael O. Casteel in the lead with CO-Ian Davis behind him and CO-Marcelinda D. Najeraaquilar behind him and CO-Lourens A. Jackson & the Unknown Correctional Officer behind him. They smashed me and slammed me to the ground so hard they broke my ribs and had me face down where CO-Michael O. Casteel crammed his fingers in both my eyes real hard busting the blood vessels in my eyes making me blind but I could feel them on top of me and CO-Michael O. Casteel & CO-Ian Davis both were slamming the right side of my head into the bottom of the steel toilet/sink over & over & over repeatedly with such force that it split my head open and spilled my blood causing me extreme pain while they also took 2

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turns punching me in the back of the head repeatedly which smashed my forehead into the concrete also causing me severe pain and while they were torturing me relentlessly, CO-Lourens A. Jackson was literally twisting my right leg so badly that he messed my right knee up to where I couldn't walk on it anymore which was extremely painful and CO-Marcelindo D. Najeraaquilor was trying to break the thumbs on both of my hands on purpose while the Unknown CO was holding me in place so I couldn't do anything at all to protect myself whatsoever and some other Officer probably Enge or Mullins kept saying "Stop Resisting. Stop Resisting." over and over which I never could have done even if I tried with 5 Men torturing me relentlessly after I was already covered in chemical agents and so everyone knows, CO-Kimberlyn D. Thompson was the Camera Operator and she very deliberately did not keep the camera on me at all times to obstruct Justice on purpose. I never resisted at all. It was impossible.

When these evil people were done torturing me for the time being, they picked me up and brought me out of the cell. I was blind and in extreme pain with my mind jumping around like crazy and I could not walk myself so they had to get a stretcher to carry me down the stairs and take me out of A-Pod into 12 Building main hallway where Registered Nurse-Robert Gage evaluated me on Video where I kept trying to explain the actual torture I was subjected to illegally and told this corrupt Nurse that my ribs/head/back/right knee/thumbs/hands/wrist/etc. were seriously injured and that I truly needed medical attention while I struggled to breathe (I forgot to mention that before Captain Enge ever sprayed me at all, I was already bleeding out my wrist from a razor cut and they saw that very clearly on Video but still used force on me anyways illegally & excessively) but this RN-Robert Gage ignored my pleas and turned back over to Security regardless of the blood seeping out of my head and wrist very obviously.

They took me to 12 Building E-Pod going to 12E-70 cell with me still complaining so when they were carrying me up the stairs they got mad and dropped me on the stairs which further aggravated my injuries but they still picked me up and took me to 12E-70 cell and the RN-Robert Gage evaluated me again and still denied me medical care and they all left leaving me on Suicide Watch after which while suffering in agonizing pain, a Mental Health Clinician-Alison Travis comes to the cell door and talks to me and I asked & pleaded for help and she lied and said she would see what she could do and left only to conspire against my rights and write bogus information on my medical record trying to make it seem like I was in the wrong. Shes a monster.

I was left in terrible pain for about 10 hours before being taken to the medical emergency room on Michael Unit where on duty medical Personnel examined me and saw: my shaking body/bulging eardrums/swollen right knee/red shot busted blood vessels in my eyes/swollen right hand/bruised right ribs/still bleeding head wound on right side/black eyes/swollen forehead/cut wrist/nausea/irregular pulse/me struggling to breathe/etc. and they decided to send me to Palestine Regional Hospital for these injuries and a catscan... Paramedics showed up with an Ambulance and observed the same things listed above as they took me to the hospital...

When we get to the Palestine Regional Hospital I was given a Catscan but absolutely no other physical examination whatsoever... After awhile the Doctor who is Unknown came over and said that although I had a concussion to my brain with serious swelling, there was no internal bleeding so he released me back to security of TDCJ-CID to take back to Michael Unit! --- Insanity! No other physical examination done whatsoever and to the hell with my brain swelling with a serious concussion! I did not want to cooperate at all! The TDCJ guards with me made calls and told me that if I did not cooperate with them that they would kill me and say I tried to escape! They put me in wheelchair to wait and I was in very serious pain, delirious, and in fear for my life and could not believe this evil sick Doctor just violated my Human Rights like that! I was completely shocked and under terrorist threat! After a half hour or so a TDCJ-CID transport Van comes and I'm pushed out to the back of it --- I hear the driver side door open & slam and someone coming --- it's CO-Laurens A. Jackson! Him and the 2 Unknown Officers with me all physically cram me forcefully into the back of this Van regardless of my agonizing pain and howling protest!

I was taken back to Michael Unit with me crammed down on the floor in the back of the Van in shackles --- I was dragged out of the Van forcefully and put in a wheelchair and left in 10 Building Medical --- all 3 of those Correctional Officers left...

The Nurses at medical talked about sending me to another hospital --- it was about 16 hours past the original assault & battery and they decided to wait for the provider - Rosemary Ofili who eventually showed up and decided I didn't need to go to another hospital but ordered me X-rays/Crutches/pain meds/bottom row bottom bunk restrictions/follow up appointments/etc. --- It took 22 days to get the first X-ray & 29 days to get the 2nd X-ray which 2
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Showed fractured ribs on my right lower side in the front of my body--- It took so long to get the X-rays due to escort Staff not taking me to my X-ray appointments who were on the Use Of Force team on February 13th, 2018! By the time I left Medical it was February 14th, 2018.

112.) It was from the Facts of ^{and 110} "Section 111" of this Complaint going forward from February 13th, 2018 up til now & ongoing that a very real Conspiracy Against my Rights immediately formed and grew to include all the Defendants listed in this Complaint including the Unknown Defendants in which they very clearly Obstructed Justice continuously with a major Campaign of Harassment & Retaliation against me for trying to exercise my Petition, Access To Courts, and Due Process Rights with the worst Offenders being those Defendants connected to the : Grievance System / Medical Department / Office of the Inspector General / Mental Health Therapeutic Diversion Program / the Chronically Mentally Ill-Sheltered Housing / etc. (and from Section 110)

But, I believe very firmly that the Conspiracy Against my Rights to Obstruct Justice for actual Crimes especially Felony Crimes committed against me by Prison Officials & Staff actually began with the Office of the Inspector General / OIG Officer Candace Sterick as I explained in "Section 104" of this Complaint.

113.) The remainder of my property that was in 12A-78 cell on February 13th, 2018 after I was taken out of the cell after the illegal Use Of Force, was left in the cell all the way until February 18th, 2018 before it was inventoried by CO-Victor Y. Afun without any of the stolen property mentioned in "Section 110" of this Complaint and he did not put it in the Property Room until February 20th, 2018 for unknown but obviously illegitimate reasons.

114.) Captain Jamadre L. Enge & CO-Barbra C. Neal stole my Religious Talisman/Amulet on February 27th and 21st, 2018 and Religious Ring too and I never got them back.

115.) Michael Unit 12 Building has no Exhaust Vent Fans on each Sections' Roof of each Pod on 12 Building to be able to remove bad air at any given time necessary to remove such bad air as : Smoke / Chemical Agents / Methane / Dead Animal Smells / COVID-19 / Gasoline Fumes / Paint Fumes / etc. ~ Its a major Health Hazard & Torture.

116.) There's an infestation of mice, big & small roaches, and spiders,
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on every Pod and every Section of Michael Unit 12 Building that's been ongoing since I got to Michael Unit 12 Building on April 17th, 2017 up til now & ongoing that has never been solved. It's a major Health Hazard & Torture!

117.) The Water supply that I am forced to use along with every other Incarcerated Person on Michael Unit 12 Building for drinking, bathing, washing, cooking, etc., is contaminated and has been the entire time I have been on Michael Unit since April 17th, 2017 up til now and ongoing where it very quickly will turn a white cloth brown to almost black brown in running sink water in all cells on 12 Building and in fact, the entire Michael Unit population is being forced to use this same toxic contaminated Water Supply also. It's a major Health Hazard & Torture!

118.) Every meal, every day on Michael Unit 12 Building in Solitary Confinement is served under very Unsanitary Circumstances/ Conditions where there are dirty, filthy trays/ tray carriers/ food carts/etc. and also continuous cross-contamination where both Incarcerated Workers and/or Prison Staff handling the food and/or drinks at each meal (including sack meals), touch dirty gates/ filthy tray slots of other inmates/ dirty tray slot bars/ nasty hand rails/ unclean doors/ unclean walkie talkies/ filthy nasty handcuffs/ dirty keys/ obscene pockets/ sweaty faces/ dirty masks/ the dirty nasty ground/ private parts/ other people/etc. and then, back & forth, they touch the food/ the trays/ the drink Jug or Container nozzles/ the drink jugs, buckets, pitchers, etc. and going back & forth touching all of the above which passes all sorts of dirt/ germs/ viruses/etc. which we Incarcerated Mentally Ill Persons on 12 Building of Michael Unit including myself are forced to endure continuously non-stop!

119.) On 12 Building of Michael Unit in Solitary Confinements cells across the entire building, there is mold in the cell walls and dust in the whole ventilation system so we Incarcerated Persons on 12 Building are forced to breathe bad air quality on a regular basis especially with no exhaust vents on every section of every Pod on 12 Building to remove bad air such as mentioned in Section 115 of this Complaint so we are forced to breathe bad air on a continuous basis.

120.) We Incarcerated Persons including myself on 12 Building of Michael Unit who are Mentally Ill and part of the Mental Health Therapeutic Diversion Program/ Chronically Mentally Ill- Sheltered Housing very rarely get Recreation and/or Showers and the entire environment outside our cells including the Showers & Recreation areas are completely filthy, nasty, dirty, contaminated, toxic, disease infected, germ infested, unsanitary, disgusting, etc. to the extreme.

So when any of us Incarcerated Persons get lucky enough to even get Recreation and/or Showers are subjected to a very toxic negative environment which makes our Mental Illnesses worse including mine. It's a Health Hazard and Torture!

121.) We Incarcerated Persons on 12 Building of Michael Unit very rarely get any cleaning supplies to clean our cells and all we do get is 5 tiny bars of bar soap every week and once a month or so give or take, we might get a pinch of bleach to clean a very small area with and it's gone so we really have next to nothing to clean ourselves and our cells with aside from what we get from commissary but even then we are unable to get any disinfectant whatsoever to kill viruses & germs at all. This makes the already toxic environment even worse and puts us at continuous risk of disease & sickness. It's a major Health Hazard and it's Torture!

122.) Michael Unit 12 Building is continuously understaffed on all shifts very badly on a regular basis which has been a problem ever since I've been here from April 17th, 2017 up til now but really getting bad to worse from 2019 up til now at which time we Incarcerated Persons who are also Mentally Ill in a wide range of diagnoses and directly involved with the Mentally Ill Program or Housing such as the Mental Health Therapeutic Diversion Program/Chronically Mentally Ill-Sheltered Housing, are continuously being denied recreation/showers/haircuts & clipper shaves/phone calls/Psychiatric Care/Proper Medical Care/any real rehabilitation/educational resources/individual therapy/etc. on a very regular basis with hardly any Security & Wellness checks and/or Bed Counts being done whatsoever by Prison Employees/On Duty Staff and what Prison Staff that is available are not at all qualified to deal with Mentally Ill Incarcerated Persons and tend to react to Mental Illness from Incarcerated Persons here on 12 Building of Michael Unit with extreme ignorance, violence, unnecessary Uses of Force (of which most have been illegal & excessive with serious injuries), threats, retaliation, harassment, belittling words, etc. that only makes matters worse all the way around and making our Mental Illness worse while making the entire environment worse & worse with extreme evil & negativity around the entire 12 Building of Michael Unit with Solitary Confinement!

123.) There's no "Offender Telephone System" available throughout Solitary Confinement/Ad-Seg/Mental Health Therapeutic Diversion Programs/Chronically Mentally Ill-Sheltered Housing/etc. for Incarcerated Persons to use including myself. There's no legitimate reason for this whatsoever and it makes communication very difficult/more difficult for those of us in the forementioned places, with our families, friends, etc. for no good reason.

124) The following items are missing from all TDCJ-CID Law Libraries Systemwide: The Offender Grievance Operations Manual / Food Services Policy & Procedure Manual / Main Monthly Menu For Food Services / SM-Q5.03 Use & Management of Chemical Agents / All Data retention & Use of Security Cameras / Incident Command System For Corrections Operations Manual / Code of Federal Regulations / Federal Rules of Decisions / Building Codes / etc. and those items directly affect the lives, liberty, prosperity of Incarcerated Persons Systemwide on a regular basis.

125) Security Cameras Data throughout TDCJ-CID is not saved long enough for Litigation or Criminal Investigations and it being done on purpose.

126) On a very regular basis here on Michael Unit, we Incarcerated Persons are being starved, undertreated, etc. and the food & drinks we are given is not up to any nutritional standards and this includes all meals on a regular basis.

127) I have been faced with & subjected to the most ferocious Religious Discrimination from Prison Officials & Staff for my entire incarceration up til now & ongoing where all my request for assistance are denied completely / ignored / unanswered / etc. by Chaplains of the TDCJ-CID such as with Chaplains: Samuel Arciprest, Thomas R. Taylor, Randall S. Clarke, with many others over the years & years... I am a Pagan in general and have been all the way back to my Childhood years. The word "Pagan" actually covers a bunch of different Paths / Groups who share somewhat similar Practices / Beliefs such as: Polytheism, Magick, Reincarnation, Holy Sabbats, Spirits, Special Diets, Special Religious Items, etc. but of which are not always exactly the same... I personally am of a very specific Path of Paganism but TDCJ-CID only uses the word Pagan or Neo-Pagan to cover all the various Paths / Groups but my Religious Needs have not been met or respected whatsoever by TDCJ-CID Officials & Staff for my entire incarceration up til now & ongoing...

I must be able to craft my own Religious / Magickal items like Talismans / Amulets and keep them on me and/or in my possession without interference or theft. I need contact with Religious Resources / Groups / Volunteers / etc. of Paganism and/or my Path continuously. My Personal / Religious Diet demands I do not eat certain animals or certain meat such as Beef or Impure Pork (which is any Pork other than wild Pork) and several others that are usually unavailable in TDCJ-CID and/or not something usually eaten anyways like Eagle or Cat for example or Squid... I cannot buy or accept Religious Items from non Pagan Sources whatsoever because it's Sacrilegious. I need to be able to have any type of beard or goatee?

along with any hair length without interference according to my Religion. My Holy Sabbats & Holidays should be respected and I should be allowed special meals at those times. --- But none of my needs have been met or respected for my Religion by TDCJ-CID Officials & Staff whatsoever and I have in fact been subjected to continuous Religious Discrimination for my entire incarceration and it has deeply contributed to my mental illness to a far extreme.

128.) In reference to "Sections 110, 111, and 112" of this Complaint moving forward; after the events on February 13th, 2018 forementioned; I chose to relentlessly seek Justice & Relief for the Human & Civil Rights abuses and Felony Crimes committed against me but immediately & continuously the efforts I put into trying to exercise my Petition/Access To Courts/Due Process Rights were met with major resistance in the form of serious Retaliation & Harassment that started with Grievance Investigators on Michael Unit such as: Brittani F. Rodriguez, Melissa B. Vixtha, Pam Pace, Charles O. Meador, Deborah G. Cockrell, Pennie R. Kempt, Margaret M. Price, Tammy L. Rainey, Monte P. Nobors, et.al. violating my Protected Conduct of Filing Grievances every single time (due to the very extreme nature of how very badly Grievance Investigators that I have listed as Defendants in this Complaint, have violated every Grievance I filed into the hundreds, I am going to give them all a Section of their own at the end of this FACTS part of this Complaint just for them.) to Correctional Officers & Staff such as: Michael O. Casteel, Dawanda K. Lacy, Ian Davis, Marcelinda D. Najeraaguilar, Laurens A. Jackson, Kimberlyn D. Thompson, and many of their CO-workers refusing to get me for my medical appointments on purpose; with the Mailroom Supervisor Amy E. McCallister and her subordinates obstructing my Legal/Media/Personal mail coming & going on a regular basis all the way till the end of 2019 even opening outgoing & incoming Legal Mail a bunch of times especially between me & Attorney Tanika J. Solomon...

This Campaign of Retaliation & Harassment grew stronger & faster and expanded quickly to include many Unknown Medical Doctors & Personnel at Michael Unit/Estelle Unit/and Hospital Galveston but some of the ones I do know for sure are: Doctor David Stebbins/Practice Manager-Pam Pace/RN-Robert Gage/Doctor Gary Wright/Mental Health Case Manager-Nannette Brock/RN-Kathy Grey/MHC-Phyllis M. Henderson/MHC-Alison Travis/et.al. here at Michael Unit and I'm not ready to jump too far ahead yet but these individuals have literally have violated my disabilities, blocked my medical care, put bogus information into my medical records, showed me very deliberate indifference to my serious mental & physical medical needs on a regular basis in a very real conspiracy together and with other defendants listed in this Complaint.

against my rights especially to obstruct Justice that is rightfully mine!

129) I wrote a series of Sworn Affidavits/I-60s/Sick Calls/Letters/etc. regarding the Issues/events explained in Sections 110, 111, & 112 of this Complaint to: the Office of the Inspector General on Michael Unit/Warden Carol Monroe Jr. of Michael Unit/Executive Director of TDCJ-Brad Livingston/the Federal Bureau of Investigation/Office of Risk Management of Michael Unit/Psych Department on Michael Unit/etc. and was given OIG Complaint #1800005440 and I did hear back from the FBI and I even contacted Anderson County District Attorney Allyson A. Mitchell too.

So they all knew very well about the crimes committed against me on February 13th, 2018 and there's solid proof of the Office of the Inspector General/Unknown O.I.G. Officers knowing very well about it and still conspiring against my rights to obstruct Justice with Prison Officials & Staff related to those events of TDCJ-CID from at least May 16th, 2018...

3rdp

130) On June 11th, 2018 I was poisoned by an SSI (Support Service Inmate) who goes by "Junior" who I never had any knowledge of before. I got a tray from him at last meal that had me sick for several days from one bite of the main course and there was an actual message carved into the tray under the main course that stated: "Don't Be Mad At Me You Did This To Yourself You Are A Hoe!" --- The only people I was having problems with were TDCJ-CID Officials & Staff. So I file complaints that were violated by:

Warden Charles O. Meador/Major Vernon L. Allen/Chief of Classification Mark A. Sandlin/Lt. Eldrick D. Birdaw/CGO-B. Howard/Warden Pennie R. Kempt/CGO-B. Barnett/UG-I-Tammy L. Rainey/UG-I-Supervisor-Margaret M. Price and the Office of the Inspector General and/or Unknown OIG Officers again! And I reported this also to MHC-Roberto Guerrero on 6-11-2018 in detail and he didn't do anything at all. --- These individuals put me danger/left me in danger deliberately and seriously violated my Protected Conduct of Filing Grievances completely and this issue is another piece of madness of the Conspiracy Against my Rights that has gotten way far out of hand. They were supposed to save video evidence and I'd already been requesting for Transfer away from Anderson County & Protection before this to no avail. (at 12A-31cell)

131) On July 31st, 2018 at about 1am, at 12A-31cell of Michael Unit; I got into a violent argument with CO-Michael O. Casteel & CO-Lourens A. Jackson about the events of February 13th, 2018 and how they and their CO-workers keep denying me my medical appointments for over a month in a half.

On purpose, CO-Michael O. Casteel threatened to find my family and fuck my Mom & Sister and do violence to them. These individuals kept antagonizing me on Video and with witnesses threatening to beat me up at Medical where there's no cameras and to violate my family... Warden Pennie R. Kempt and CGO-C. McKellon immediately conspired against my rights to obstruct Justice when I filed Grievances and they deliberately avoided the Office of the Inspector General --- the incident was on video and there were plenty of witnesses but no investigation was done in my favor --- only conspiracy to obstruct Justice!

132) On 8-31-2018 at 12E-33 cell I was taken to medical by CO-Darwanda K. Lacy where Doctor Gary Wright straight up told me he's not doing nothing for me at all and that's exactly what he did too and was there in regards to the injuries I received on 2-13-2018 and I found out on 4-19-2018 that he got on my medical file and lied real bad like as if he did a full body examination even claiming that he examined my genitals & anus with only a Female Staff present. He also lied about my injuries on purpose and contradicted X-ray evidence and lied about doing more examinations that never happened and discontinued my cane stating that I walk without it touching the ground. Absolutely insane! He made me feel sick & dirty inside about checking my genitals & anus when it never happened at all. My Grievances were completely violated in conspiracy against my rights by Practice Manager-Iam Pace and CGO-IO352 along with UGI-Tammy L. Rainey & UGI-Supervisor-Margaret M. Price, completely and utterly which at cause they had already been doing since the events of 2-13-2018 along with many other Grievance Investigators all documented...

133) O.I.G. Officer-Curtis D. Bitz in regards to "Cause No. 87CR-20-34556" at the "THIRD JUDICIAL DISTRICT COURT OF ANDERSON COUNTY, TX;" deliberately conspired against my rights with: Lt. Gwendolyn R. Fuller / Captain-Vernon L. Allen / Counsel Substitute-Rachel R. Rowland / Warden Pennie R. Kempt / CGO-M. Blalock / Counsel Substitute-Stephanie P. Ranklin / Warden-Charles O. Meador / Captain-Olin C. Statham Jr. / CGO-B. Barnett / Major-Sean F. Marshall / Lt. William T. Mullins / UGI-Supervisor-Margaret M. Price / UGI-Melissa B. Vixtha / UGI-Viveca M. Matlack / Sgt. John H. Holmes / and other unknown OIG Officers & TDCJ-CID Officials & Staff; to use the false testimony of inmate Quaja D. Goodman who was & is severely psychotic and chronically mentally ill and who hurt himself and blamed it on me on November 7th, 2018 saying I hit him in the eye with hot water days before that so they see me on Video Camera throwing water with steam at his cell door from 12E-33 to 12E-34 around 2am on November 5th, 2018 but Quaja D. Goodman is nowhere to be seen in the Video at all that these 2
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Investigators "Chose to Use" when in fact there was a camera facing right at his slot that proves my innocence but they destroyed that video and also they deliberately avoided the simple fact that from the 2am November 5th, 2018 throwing of water from out of my steaming sink water; Quaja D. Goodman never reported any injury whatsoever until November 7th, 2018 and also neither did any of the over 20+ TDCJ-CID: On duty Staff / Nurses / Mental Health Staff / et al. that were all on Video at Quaja D. Goodman's Cell somewhere around 100 times or more doing: Showers & Recreation / Security & Wellness Checks / Laundry / Feeding Breakfast, Lunch, and Dinner / Psychiatric Checks / Passing Out Medication / etc. and Quaja D. Goodman ate his food every meal, went to shower, took his medication from Nurses that they had to watch him take, get Laundry, spoke to Byche Staff, etc. and obviously he didn't report an injury because there was no injury which is the very same reason that none of the Staff reported any injury either but again, these Prison Officials along with OIG Officer Curtis D. Bitz all destroyed all that Video evidence on purpose and never included any of the testimony of any of those Staff that never reported any injury to Quaja D. Goodman at all and who Quaja D. Goodman never reported any injury to either from 2am November 5th, 2018 til the afternoon of November 7th, 2018. These TDCJ-CID Employees I named along with unknown others and OIG Officer Curtis D. Bitz tampered with evidence / destroyed evidence in order to gain some sort of leverage over me with a felony charge while they continued to conspire against my rights to Obstruct Justice for the long list of Felony Crimes committed against me on February 13th, 2018 / June 3rd, 2018 / etc.!

I spoke to OIG Officer Curtis D. Bitz on November 14th, 2018 and did mention the February 13th, 2018 events in brief and he said he'd look into it but he lied. But where his involvement gets even worse is after the events of April 5th, 2020 which I'm getting to where he has deliberately denied me my Victims' Rights once again which is an ongoing problem now but let me work my way up to those events. "There's alot more to this."

134.) On December 9th, 2019 at Michael Unit 12 Building D-Rod 2-Section in the Mental Health Therapeutic Diversion Program / Chronically Mentally Ill-Sheltered Housing; there was a quadruple excessive Uses of force implemented against: Damien Green #1707884 / Caleb Gipson #2047214 / Billy McClain #2082431 / and myself that started with "Sgt. Daniel R. Jett" terrorizing Damien Green at the bottom of the sections stairs to shortly after under the supervision & authority of Major Guillermo M. Delerosa, Captain Jason M.
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Gould, and Lt. Sherrell D. McCoy; CO-Chase R. Johnson/Sgt. John H. Holmes/Sgt. Victor F. Afari/Sgt. Abbie G. Andrews/Sgt. Francis Kyei/CO-Carlos U. Duran et al., skinned Damien Green #1207884 on the concrete for no good reason and then proceeded to skin Caleb Gipsan #2047214 on the concrete and drag him into 12D-15 cell where they assaulted & battered him in which followed an attack on Billy McLoir #2082431 at 12D-16 cell with Riot Shields and tray slot bars violently and then me being attacked with a riot shield by CO-Chase R. Johnson who tried to slam the shield down on my wrist from above his head with CO-Kamry D. Kinder spraying me with Chemical agents and CO-Prince C. Hall threatening my life. The multiple assaults & batterys went from about 2:50pm to 3:30pm and my hand "right hand" was hurt in the tray slot and none of us got medical attention or Use of Force physicals until months later on February 26th, 2020. All of that was extreme torture & abuse.

I wrote Grievance #2020054960 "which was stolen" but I have a copy and there was an OIG investigation and I was interview on February 3rd, 2020 by an Unknown OIG-Officer (I can't remember the name) and I explained what happened but ultimately to no surprise, this OIG-Officer conspired against the rights of me and the other incarcerated persons named to Obstruct Justice once again. When my Grievance was stolen, I could not get the Grievance Office to send me a copy so I could file my Step 2 and I was scared to use my copy because they would steal it.

135.) On March 9th, 2020 at Michael Unit 12 Building D-Pod 43 cell I was served spoiled food by CO-Olufermi Oladipo along with everyone else on my section 12D-4 Section "Cells 43 to 56" where he claimed we were all lying and when Sgt. Franklin G. Nzeribe showed up, I was singled out with CO-Olufermi Oladipo telling the Sgt. I was lying while others on the section were burning fires on the run and I got mad as hell and threw water and they left after 4pm. A whole hour goes by when suddenly comes Lt. Erik L. Brannon/Sgt. Franklin G. Nzeribe/CO-Collins K. Sintim/Unknown Camera Operator and 4 Unknown Correctional Officers to my door in Use Of Force gear. An Unknown Supervisor authorized this Use Of Force above Lt. Erik L. Brannon without getting qualified medical psyche personnel to speak with me to de-escalate the situation psychologically regardless of my disabilities. I was even more angry and couldn't think straight & couldn't follow or understand any orders and Sgt. Franklin G. Nzeribe sprayed me excessively with Chemical Agents repeatedly and while the 5 Man Team tried to get the door open I tried to come out so I wouldn't get hurt in the cell but couldn't and ended up getting my right arm twisted & smashed in the door so my arm ended up out the tray slot and they slammed the door open.

Smashing my arm in between the cell door slot and concrete wall & holding it there smashed in a vise grip on purpose while others ran in and shoved me down to the concrete between door & toilet twisting me around pulling my feet towards the bunk away from the door with my right arm still being held on purpose in the vise grip feeling like it would be broken & muscles pulled from all the way up my shoulder, arm, back, and neck with me dangling in the air off the ground between my feet being pulled & my right arm stuck in the vise grip out the slot of the door like I already explained --- that torture went on for a little while before they let my arm out of the vise grip releasing onto the ground where the Officer by my head began sticking his fingers in my left eye and then punching me over & over & over in my left eye & ear while others at my feet kept yanking on my legs for quite some time --- I kept on asking them to stop and the camera operator did not keep the camera on me deliberately to obstruct justice and I said everything going on loud & clear as best as I could with injuries... I couldn't walk due to my injuries to my right knee, right arm, back, and I was having chest which I tried to explain but was ignored & denied medical care. I was picked up off the ground regardless of my injuries, put on a gurney and taken to 12E-19 cell still burning badly from chemical agents, got picked up again and put in 12E-19 cell and left in handcuffs and the door shut and Lt. Eric L. Brannon had the camera turned off and told me I'm not getting medical care for at least 12 hours, called me a child molester real loud for other inmates to hear (which I am not) and said that's what I get for filing lawsuits and that I should take it like a man! (whatever the hell that's supposed to mean) They turned camera back on, got cuffs off me, and then LVN-Abiodun Alade did a fake evaluation of my injuries where I told him on camera of the injuries to my back, right arm, right knee, left eye & ear, etc. but he deliberately denied me medical care and released me injured back to security and they all left at about 10:30pm or so... I was left in serious pain & suffering for over 8 hours before being taken to medical by Sgt. Rooks where additional use of force pictures were taken. I had to limp with assistance because the use of force staff CO-Sintim and unknown others stole my medical walking cane and threw it in the trash along with my shorts and all my pens to write with. (Got to Medical on March 10th, 2020 after 6am...)

At Medical at some time after 6am I discover that LVN-Abiodun Alade was trying to obstruct justice by not doing the use of force physical for the excessive force I was just subjected to. Instead, LVN-Tammy Tarrant does it and I was seen to have: bloody spot on upper right forehead, left ear black & red, damaged left eye, etc. and I reported my back, right arm, right hand, right shoulder, etc. and she saw a gash on the inside of my right tricep with internal bleeding but she refuses to order X-ray?

for my right arm... I was also denied medical care for these issues at Estelle Unit by Nurse Gee and at Hospital Galveston by Nurse Rone but ultimately every Grievance I wrote about these issues both regarding the use of illegal force & medical issues from it, were completely violated by the Grievance Investigators: Warden Charles O. Meador CGO-V. Barton Practice Manager-Pam Pace and the Unknown CGO-IO352 and Unknown OIG Officer-10964? --- yes, OIG knew about these illegal events against me once again and denied me my Victims Rights once again!

136.) On April 5th, 2020 on 12 Building B-Pod 44 cell & 3 Section; there was a fire on the concrete run/walkway over two cells to my left and out away from the cells about 15 to 20 feet or so in protest of some idiot on our row of 7 cells that kept blowing out the cell power for the entire row on purpose which had me with no cell light or power so I was left in darkness every time the Sun went down and we were all suffering like that for weeks on end with no help at all --- this fire was after 5:30pm... Sgt. Franklin G. Nzeribe comes with a fire hose to put the fire out and several Incarcerated Persons were trying to explain the situation but when he saw & heard me, he started spraying my cell with the firehose flooding my entire cell out front to back. The fire was already out and was never anywhere near my cell in the first place, so I got mad and was throwing water back at him. I was drenched myself from all the water he sprayed at my cell & me. So finally he leaves and around 6pm or so there comes Lt. Shayna McArthur & Sgt. Adesanya S. Adeniran leading a 5 Man Team with a Camera Operator to my cell...

At no time before the following very illegal excessive use of Force did any qualified medical/psychic personnel try to diffuse the negative situation and nor did any come see me afterwards! --- I was told at first that they were going to pull me out, take my property, and put me back in my cell and that's what Sgt. Adesanya S. Adeniran said on camera at my cell door with CO-Oluhanmi Oseye as the Camera Operator and: CO-Obadina S. Omoaka/CO-Olawale E. Osibajo/CO-Jombo K. Oji and 2 Unknown Correctional Officers on the 5 Man Team and Lt. Shayna M. McArthur off to the side... The Sgt. ordered me to strip search & to submit to hand restraints and I did comply and was handcuffed behind my back. My cell was still dark with no power and when they opened the cell door and came out I believe Lt. Shayna M. McArthur suddenly said on camera to take me to a cell on 12 Building E-Pod, so I layed down on the run on the concrete in the dirty water because of my knee injury...

The Team got angry because I would not walk --- they put feet shackles on me and then they forcefully pulled & pushed me back into 12B-44 cell with no cell,
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light on in the dark with me on my ass until I was about 3 feet or so in the cell
 CO-Obadina S. Omoaka - AKA "Miami" on my left foot) and they all attacked me
 from every direction at the same time while the "Camera Operator" - CO-Olubunmi
 Oseye deliberately did not keep the Use Of Force Camera on me according to Law
 and both Lt. Shayna M. McArthur & Sgt. Adesanya S. Adeniran allowed me to
 be viciously assaulted & battered with very serious bodily injury on purpose! ---
 In the cell, on my ass with my hands cuffed behind my back with feet shackles
 on, with relentless illegal force I was kneed repeatedly in my forehead by CO-
 Obadina S. Omoaka / Kneed & kicked in my back from the left & right a bunch of
 times very hard repeatedly. Punched all over my head, neck, and shoulder area
 by the CO who was pulling my right leg going in the cell and CO-Obadina S. Omoaka
 who was pulling my left leg, simultaneously along with another Officer behind me
 to the left / The Officer who pulled my right leg in, stomped my right foot ankle
 into the concrete real hard / Officer right behind me was stomping me so hard
 in the back repeatedly that it forced me to swing over each time slamming my
 forehead into the concrete each time busting my head open spilling my blood all
 down my face and all over the floor and down my body / Skipped repeatedly by
 CO-Obadina S. Omoaka in my face, even slapping my glasses off my face
 when this torture began / etc. I begged them to stop and thought I
 was gonna be either killed or paralyzed by them! It was insane torture to
 the farthest extreme! After being brutally beaten & viciously tortured
 by these monster Staff members of the TDCJ CID Michael Unit, I was carried
 out and put on a stretcher / gurney and taken to the Emergency Room at IO-
 Building Medical...

At the Medical ER, a Conspiracy against my rights quickly formed to
 obstruct Justice for the Felony Crimes that were committed against me as I
 just explained ~ this conspiracy involved: Lt. Shayna M. McArthur / RN-Oghene-
 Nikevwe Ekayama / Sgt. Adesanya S. Adeniran / LVN-Michelle Calhoun / CO-
 Olubunmi Oseye / CO-Obadina S. Omoaka / CO-Jumbo K. Oji / CO-Olawale E.
 Osibajo / the 2 Unknown Team Members / and Unknown Medical Personnel; and
 what they did was put my Life in danger by denying me a Catscan at a
 freeworld hospital for my Head / Brain and also for all the other injuries that
 were obvious and that I reported such as: Gashes on my forehead still
 bleeding of which one was over 1 1/4 inches long & 1/4 inches wide / immense feel-
 ing of pressure in my head / very dizzy / Serious pain all over / Very serious back
 pain / right ankle & foot pain / I told them yes I wanted a Catscan on video /
 delicious pain / tasting blood / neck pain / gashes kept bleeding / Seeing things
 moving around in my vision / etc. but they gambled my Life to try and con-
 sider the Felony Crimes and denied me serious medical care!

They gave me no stitches and did no Use of Force physical documentation! They lied and said I would get the Catscan later on but it never happened! I was told much of these lies by RN-Oghenerukewe Ekayoma personally and she lied and said I would have a follow up appointment the next day too!

I was held on both sides by 2 of the Correctional Officers that were on the Team that smashed me and taken back to 12B-44 cell but my head gashes started bleeding down my face again and I had to go back to Medical again only to have my head wrapped and still no stitches and I was taken back again on a very slow agonizing journey to 12B-44 cell where they had taken everything out the cell completely making me lay on steel injured severely! I suffered so badly that I can't even explain the madness of it! All thru the night I smelled blood, tasted blood, iron, felt like my head was going to explode, etc. ~ I felt nauseated, sick & dizzy... No-one ever came for the Catscan, and the next day on April 6th, 2020 I was trying to find out what's up with my Catscan & Follow Up medical appointments but "On Duty Staff" told me very specifically that: Captain-Nicholas C. Martin / Lt. Terry L. Lane / Sgt. Daniel R. Jett; told them not to let me out of my cell for any reason whatsoever! Regardless of the fact that I was in need of Emergency Medical Care! (Dayshift)

On April 7th, 2020 I managed to get to the dayroom and tried to get Staff to take me to medical but instead, Captain-Nicholas C. Martin authorizes Lt. Terry L. Lane & Sgt. Daniel R. Jett to use force on me again to make me get back in my cell with no medical care and they told me if I didn't go back in the cell they would smash me again! and they made me strip and remove the head wrap revealing the gashes on my head! They conspired against my rights with all the individuals I named in this Section of this Complaint so far.

I found out later on from Provider-Rosemary Offit that medical personnel on April 5th, 2020 & Use of Force Staff named tried to lie and say I fell down by accident. Phew! Madness! --- All my Grievances about these FACTS were violated by: Practice Manager-Jamlae / CGO-E-0352 / Warden - Pennie R. Kempt / CGO-V. Barrow / UGI-Alicia M. McElvea / UGI Supervisor - Margaret M. Price ... *OIG case #2000009374 was eventually assigned to the April 5th, 2020 events but they have none other than OIG Officer - Curtis D. Bitz investigate it and I spoke to him on September 4th, 2020 on Video recording in his Office on Michael Unit where my mental illness took over and I went into a rage seeing the actual video of the April 5th, 2020 incident forementioned --- it made me have homicidal thoughts! 2

137) The Office of the Inspector General conspired against my rights putting OIG Officer Curtis D. Bitz on a case involving my Victims Rights but the Office of the Inspector General / OIG Officer Candace Stevick / Several Unknown OIG Officers / and of course OIG Officer Curtis D. Bitz, have all: discriminated against my disabilities relentlessly, conspired against my rights to obstruct Justice for Felony & Misdemeanor Crimes committed against by TDCJ-CID (against me) Prison Officials & Staff including other working under color of law for or with TDCJ-CID such as UTMB Medical Personnel. On Video in the interview with OIG Officer Curtis D. Bitz on November 14th, 2018 and on September 4th, 2020; I very clearly brought up the prior illegal Uses of Force committed against me especially in regard to events on 2-13-2018 / 12-9-2019 / 3-9-2020 / and of course 4-5-2020, but here it is right now, December 28th, 2021 and none of my Victims Rights have ever been fulfilled whatsoever.

Bryan

TDCJ-CID / Executive Director Bryan Collier, also investigated and I was interviewed on May 11th, 2020 by Captain Nicholas C. Martin (who personally conspired against my rights as forementioned in Section 136 of this Complaint), then on July 24th, 2020 by Major Guillermo M. Delarosa (who was part of Section 134 of this Complaint), then a Ms. Newman on August 4th, 2020 and Captain Coby S. Evans that same day and again with Capt. Evans on August 17th, 2020 and in all those interviews I presented both verbal & documentary evidence about all the illegal Uses of Force committed against me on Michael Unit as forementioned --- so, there is indeed very solid proof that TDCJ-CID & OIG Officials & Staff knew & know about all the crimes against me and still have done nothing to protect me, transfer me, or help me in any form or fashion whatsoever!

138) On April 10th, 2020 a razor blade showed up in my food at lunch at R Building Michael Unit 4 cell which I reported to On Duty Staff such as: Officer Sanchez and I informed Doctor David Stebbins & Major Guillermo M. Delarosa but none of them would help me at all!

139) The following individuals from February 13th, 2018 up to now & ongoing have participated deliberately in violating my very serious medical needs regarding my physical & mental health and their violations both have left me injured in non-stop pain and have caused me further injury: Doctor David Stebbins / Practice Manager - Pam Pace / Provider - Rosemary O'Neil / RN - Kathy Grey / RN - Robert Gage / CGO - T0352 / MHC - Roberto Guerra / MHC - Alison Travis / MHCM - Nannette Brock / VP UTMB Owen Murray / LVN - Marcy Mayhugh / LVN - Abiodun Alade / LVN - Tammy Tarrant / RN - Oghenerukevwe E. Ekeiyoma / LVN - Michelle Calhoun / Doctor - Paul Shrader / LVN - Lori Fortner / MHC - Phyllis M. Henderson

Doctor Gary Wright / Many Unknown Michael Unit Medical Personnel / UGI - Khari Mott / Nurse Gee / Provider - Termitope Adams / LVN - Jeffrey L. Shearman / NC - Michelle Northcutt / NC - Rick Stancil / LVN - Cheryl Lang / NSO - Katherine Werner / Many Unknown Estelle Unit Medical Personnel / RN - Ms. Brown at Hospital Galveston / Several Unknown Doctors & Medical Personnel at Hospital Galveston et al. --- * They Jointly and/or Severally have : Blocked me from getting MRIs for all my injuries / Blocked me from getting Full medical examinations of all my injuries so I can get proper treatment / Blocked me from getting my medical records from 2-13-2018 up til now and for the issues at Connally Unit 2 Jester 4 / Stopped me from being transferred permanently to or close to Hospital Galveston so I do not have to suffer from long distance transport that aggravates my injuries and so I can be somewhere where I can get way better medical care / made me paranoid of medical staff / denied me real psychological care / tampered with my medical records / Conspired against my rights to obstruct Justice for crimes committed against me by TDCJ-CID Officials & Staff / denied me COVID-19 Lab Test when I complained of symptoms / denied me strong pain medication / etc.

140.) Every TDCJ-CID transport bus / van / etc. I have ever been in / on, was 2's : completely unsanitary to the extreme / unsafe in completely unnecessary shackles with hands twisted all crazy chained to feet which are chained together also / no seat belts / no accommodations for disabled persons / etc.

141.) Solitary Confinement is still being used in TDCJ-CID under various names such as : Administrative Segregation / Mental Health Therapeutic Diversion Program / Chronically Mentally Ill - Sheltered Housing / etc.

142.) The entire time I have been on Michael Unit 12 Building in the Mental Health Therapeutic Diversion Program / Chronically Mentally Ill - Sheltered Housing ; Mentally Ill Incarcerated Persons have been subjected to continuous : illegal / unnecessary / excessive uses of force by TDCJ-CID Officials & Staff on a very regular basis with the Full Knowledge of Doctor David Stebbins who is over these programs and also with the Full Knowledge of every Warden that has been responsible for Michael Unit / 12 Building and on to the Regional Directors Office and on to the CID Directors Office regardless of our disabilities.

143.) Every Grievance I have filed from February 13th, 2018 up til now, has been deliberately violated in a conspiracy against my rights to obstruct Justice and block me from getting my serious medical needs taken care of properly as I tried to exercise my Petition / Access To Courts / Due Process Rights relentlessly and they all knew / know about my Disabilities very clearly ; these are 2
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People who violated my Protected Conduct of Filing Grievances on purpose as fore-mentioned: UGI-Brittani F. Rodriguez/UGI-Melissa B. Vixtha/Practice Manager-Pam Pace/CGO-ID352/Warden-Charles O. Meador/Warden-Deborah G. Cockrell/Warden-Pennie R. Kempt/UGI-Supervisor-Margaret M. Pike/UGI-Tammy L. Rainey/Warden-Carol E. Monroe Jr./CGO-B. Barnett/CGO-M. Blalock/CGO-B. Howard/CGO-V. Barrow/UGI-Monte P. Nobbs/UGI-Rachel R. Rowland/UGI-Supervisor-Jessica L. Back/UGI-Dawn M. Huffman/UGI-Khari Mott/UGI-Vivica M. Motlack/UGI-Halei J. Klaminsky/CGO-Jessica Riley/CGO-J. Smith/CGO-Timothy C. Jones/UGI-Alicia M. McElyea/UGI-Bobby Burns/UGI-Kathy Grey/Warden-Tracy Hutto/UGI-Debbie L. Poole/UGI-J. Peterson/UGI-Terri L. Vassilico/UGI-D. Raden/UGI-Andrey Vasiljev/CGO-M. Lewandowski/CGO-C. McKellan/CGO-S. Gurrola/CGO-C. Martinez/CGO-K. Ward/CGO-M. Travis/CGO-V. Barnes/CGO-B. Ferguson/CGO-H.M. Pederson/CGO-R. Lerma/CGO-T. Phillips/Warden-Michael Collum/CGO-Tammy Shelby/Warden-Jeffery S. Richardson/CGO-D. Williams/CGO-I2448/UGI-T. Jack/UGI-Steve Massie-ARD/and of course there are several Unknown Grievance Investigators along with Unknown OIG Officers involved also!

None of my requested actions were granted/They stole my Grievances/Refused to process my Grievances properly/Gave me no relief at all/Many times they would not even pick up Grievances on purpose/Damaged my many Grievances/Refused to coordinate my Grievances with OIG properly/lie on my Grievances/etc. ~ absolute madness! Straight up tortured me to this very day! A massive conspiracy against my rights to obstruct Justice with a very serious Campaign of Harassment & Retaliation against me to the very far extreme of madness! It's truly evil and sick to me and has me traumatized for real! I asked for Protection from almost all of the Defendants in this Complaint and that includes these Investigators who have committed felonies to cover up felonies but they just keep on & kept on going & going & going even investigating Grievances against themselves! I asked a bunch of times to be transferred away from Anderson County away from the Defendants who hurt me to no avail! I requested to be transferred permanently to or close to Hospital Galveston so I do not have to suffer long distance transports that aggravate my injuries! And so much more but they violated all my Grievances to the point where the Grievance System of the TDCJ-CID is completely corrupt & unavailable to me under Federal Law! All they do is violate me with evil intentions and evil motives! It's monstrous evil!

144) I am willing to submit to Polygraph Test regarding these FACTS to
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the best of my knowledge as I have presented in this Complaint so far. There are in fact, a lot more FACTS both known & unknown that will obviously come to the light as we move forward with investigation & discovery. I am not making up these FACTS although there are unknown factors that need to be proven and I am unable to do it all myself especially when these Defendants will not cooperate with me at all as can be seen very obviously. There's about somewhere around 200 Grievances in my possession in relation to most of these FACTS along with many Sworn Affidavits & Witness Statements and IGOs/SICK Calls/etc. (A Bunch!!) and other evidence too but there is also beyond my personal reach at this time, Video Evidence/Medical Records/MRIs of my whole body that have not been done on purpose as of yet/TDCJ-CID & OIG Records/Possibly more witnesses to be found/Audio Recordings/etc. --- These Defendants named in this Complaint have conspired together against my rights to obstruct justice for actual Felony Crimes and/or actually participated in the original Felony Crimes themselves in conspiracy with others also before being part of the overall massive conspiracy against my rights that is also Felony in nature and they all have discriminated against my disabilities/retaliated against me while knowing I was & am disabled/made my disabilities worse & worse on purpose/etc.

145) TDCJ-CID; the Texas Department of Criminal Justice-Correctional Institutions Division/O.I.G.; the Office of the Inspector General/TBCJ; Texas Board of Criminal Justice/UTMB; University of Texas Medical Branch/TDCJ-CID Director-Bobby Lumpkin/Former TDCJ-CID Director Lorie Davis/TDCJ-CID Executive Director-Bryan Collier/TBCJ-Chairman Patrick O'Daniel/Former TBCJ-Chairman Dale Wainwright; in relation to all the FACTS presented that are their responsibility and/or were their responsibility in this Complaint and how they are responsible (without making Legal Claims) individually/officially without going into graphic detail at this time; so, with all the FACTS I have presented in mind, these individuals are responsible for the adversity of the FACTS I have presented jointly and/or severally because:

(d) They have conspired against the rights of Incarcerated Persons to Obstruct Justice for injustices committed against Incarcerated Persons throughout the TDCJ-CID by being deliberately indifferent to the very extremely obvious corruption of the TDCJ-CID Grievance System Systemwide which is a very widespread practice that has been ongoing for my entire incarceration and beyond so that although this deliberate corruption may not be authorized by law or policy, it is so permanent and well settled as to constitute a custom and/or usage with the very force of law so strongly that it reveals a major failure with deliberate indifference to adopt policies necessary to prevent

Constitutional Violations under law!

(b) They have conspired against the rights of Incarcerated Persons with serious Disabilities by deliberately subjecting these Incarcerated Persons with serious Disabilities to: very extremely inhumane & torturous conditions of confinement / inadequately trained Staff / Staff who are inadequately supervised / Staff who are inadequately screened during the hiring process / Failure to adopt needed policies that are very obviously needed to prevent constitutional violations / Staff who discriminate & retaliate against disabilities / inadequately staffed facilities / Staff who have histories of violence and/or mishandling situations involving Incarcerated Persons with Disabilities / etc... They have been & still are doing all of that with very deliberate indifference which has & is doing very serious harm to Incarcerated Persons with Disabilities such as myself as revealed in the FACTS of this Complaint.

(c) They have been & are conspiring against my rights knowing very clearly about the FACTS that I have presented in this Complaint and yet they still have shown me no relief to remedy or rectify the evil that I have been subjected to that I have tried to share in the FACTS of this Complaint regardless of the very solid evidence that proves their very deliberate indifference with evil intentions and evil motives that actually shocks the conscious and they all have had years and years to give me the Justice I deserve but have not on purpose which has ruined my Life, Liberty, and Prosperity and has damaged me permanently physically, mentally, emotionally, and spiritually that I am traumatized and will need very serious Justice, Relief, and surely Life long therapy to pull thru and overcome this insanity I have & am subjected to! May the Court have mercy on my Soul!

IV. LEGAL CLAIMS

46.) The Retaliation, Discrimination, Intimidation, etc. perpetrated against me, Jamon Nathaniel Hestand the PLAINTIFF in this Complaint, by the Defendants Jointly, Severally, and in Groups against my Disabilities/me while knowing I was & am disabled as I have related throughout the FACTS of this Complaint where they conspired against my rights / obstructed Justice / Tortured me / Stole my Property / Assaulted & Battered me with serious injuries / Violated my Protected Conduct of Filing Grievances / Discriminate against my Religion / cover up sex crimes / Denied me serious medical care / etc.; is & was a major violation of the Americans with Disabilities Act 42 USC § 12101 under Title 1, 2, and 3 of the ADA. The specific Defendants responsible under

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this/these ADA Claim/Claims are: TDCJ-CID "Texas Department of Criminal Justice-Correctional Institutions Division"/O.I.G. "Office of the Inspector General"/UTMB "University of Texas Medical Branch"/TBCJ "Texas Board of Criminal Justice." How they violated my rights as I explained in "Section 145" of this Complaint reveals in relation to all the FACTS exactly how they have violated my Rights & Disabilities under the Americans with Disabilities Act for this LEGAL CLAIM and in so doing, They have & are by the truth of this Claim, made all of the following LEGAL CLAIMS and make all the following LEGAL CLAIMS way worse than otherwise and that FACT is truly terrible because even without my disabilities, the other LEGAL CLAIMS are monstrous in their own right! And so with my disabilities, all the following LEGAL CLAIMS are in FACT, magnified into Pure Torture within a realm of madness in reality. These DEFENDANTS named in this LEGAL CLAIM are not immune under the eleventh amendment to the Constitution of the United States from an Action in this Court which has competent jurisdiction for a violation or violations of the Americans with Disabilities Act. (42 USC § 12202)

147) Under 42 USC Section 1983, I, JAMON NATHANIEL HESTAND the PLAINTIFF in this Complaint, hereby bring an array of LEGAL CLAIMS that I shall proceed to put forth into sub-Sections of this "Section 147" so that each sub-section will in fact be an individual LEGAL CLAIM but all of them are brought forth under 42 USC Section 1983. (Sub-Sections: (a)(b)(c)(d) etc.)

(a) The Obstruction Of Justice, for Felony & Misdemeanor Crimes committed against me by Defendants named in this Complaint working for the TDCJ-CID under color of law as mentioned throughout the FACTS of this Complaint, by the: Office of the Inspector General/OIG Officer Candace Sterck/Unknown OIG Officers/and OIG Officer Curtis D. Bitz and deliberate denial of Victims' Rights of mine related to those Crimes against me as related throughout the FACTS of this Complaint by these same individuals/entities just named, Violates my rights and constituted/constitutes: Torture & Very Cruel and Unusual Punishment/a Major Due Process Violation/a serious Denial of Equal Protection of the Law, under the 8th & 14th Amendments of the United States Constitution.

(b) The Malicious Prosecution, being brought against me as I related in "Section 133" of this Complaint with the FACTS presented in "Section 133" of this Complaint, by the Defendants named specifically in "Section 133" that are named DEFENDANTS from "Section 4" thru "Section 103" of this Complaint, and as a result of their adverse actions against me in "Section 133" of

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This Complaint, is Violating my rights and ~~constituted/constitutes~~: Torture & Very Cruel and Unusual Punishment/A Major Due Process Violation/A Serious Denial of Equal Protection of the Law, under the 4th, 8th, and 14th Amendments of the United States Constitution.

(c) The Theft of my Property & Illegal/Excessive Uses of Force, committed against me as I related in "Sections 104, 110, 111, 113, 114, 134, 135, 136" under the FACTS in this Complaint by the Defendants named there-in those Sections of this Complaint, violates my rights and ~~constituted/constitutes~~: Extreme Torture & Extremely Cruel and Unusual Punishment/Unreasonable Search & Seizure/A Major Due Process Violation/A Serious Denial of Equal Protection of the Law, under the 4th, 5th, 8th, and 14th Amendments of the United States Constitution.

(d) The Very Deliberate Indifference to my Serious Medical Needs, committed against me as I revealed in "Sections: 104, 110, 128, 132, 134, 135, 136, 139, 143, 144, 145" under the FACTS of this Complaint by the Defendants named there-in those Sections of this Complaint, violates my rights and ~~constituted/constitutes~~: Extreme Torture & Extremely Cruel and Unusual Punishment/A Major Due Process Violation/A Serious Denial of Equal Protection of the Law, under the 5th, 8th, and 14th Amendments of the United States Constitution.

(e) The Massive Campaign of Retaliation & Harassment, committed against me by All the Defendants named in this Complaint as I revealed in "Sections: 104, 105, 108, 109, 110, 111, 112, 113, 114, 125, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 141, 142, 143, 144, and 145" under the FACTS of this Complaint, violates my rights and ~~constituted/constitutes~~: A Major Violation of Freedom of Speech & Association/A Serious Violation of the Free Exercise Clause/Extreme Torture & Cruel and Unusual Punishment/A Major Violation of Petition Rights/A Denial of Access To Courts Rights/A Serious Due Process Violation/A Major Denial of Equal Protection of the Law/Unreasonable Search & Seizure, under the 1st, 4th, 5th, 8th, and 14th Amendments of the United States Constitution.

(f) The Extremely Terrible Conditions of Confinement that I have been subjected (along with other Incarcerated Persons) to by All the Defendants named in this Complaint as I have revealed throughout All the FACTS of this Complaint, violates my rights & other Incarcerated Persons rights which ~~constituted/constitutes~~: A Major Violation of Freedom of Speech & Association/A Serious Violation of the Free Exercise Clause

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Extreme Torture & Cruel and Unusual Punishment / A Major Violation of Petition Rights / A Denial of Access To Courts Rights / A Serious Due Process Violation / A Major Denial of Equal Protection of the Law / Unreasonable Search & Seizure, under the 1st, 4th, 5th, 8th, and 14th Amendments of the United States Constitution.

148) Under 42 USC Section 1985 & 1986, I, JAMON NATHANIEL HESTAND, the PLAINTIFF in this Complaint, have been subjected to an actual Conspiracy Against My Rights by All the Defendants named in this Complaint including the ones that are still unknown as I have revealed to the best of my knowledge and ability at this time (without any Exhibits as of yet due to my haste to meet the deadline for the extension of the Statute of limitations for issues that arose from February 13th, 2018 and beyond as should have been handled properly in Case #6:20-cv-00071-JDK-JDL but was not obviously) in All the FACTS of this Complaint, violates my rights to the farthest extreme while amplifying all other Claims brought forth under "Section 146 & 147" of LEGAL CLAIMS in this Complaint at the same time which constituted / constitutes: A Major Violation of Freedom of Speech & Association / A Serious Violation of the Free Exercise Clause / Extreme Torture & Very Cruel and Unusual Punishment / A Major Violation of Petition Rights / A Serious Denial of Access To Courts Rights / A Serious Due Process Violation / Unreasonable Search & Seizure / A Major Violation of Equal Protection of the Law, under the 1st, 4th, 5th, 8th, and 14th Amendments of the United States Constitution.

149) I, JAMON NATHANIEL HESTAND, the PLAINTIFF in this Complaint, have no plain, adequate, or complete remedy at law to redress the wrongs described herein. I have been and will continue to be irreparably harmed / injured by the conduct of the Defendants unless this Court grants the declaratory and injunctive relief which I seek.

V. PRAYER FOR RELIEF

* Wherefore, I, the PLAINTIFF, respectfully pray the Court enters judgement:
 -150) Under my LEGAL CLAIMS in regards to "Section 146" of this Complaint, I pray for Relief under Title 1, 2, and 3 of the Americans with Disabilities Act (42 USC § 12101...) which I shall request under individual sub-sections of this "Section 150" with what I believe to be the appropriate Defendants for each Title.

(1) Under Title 1 (42 USC § 12111): Judgement against TDCJ-CID & LITMB as follows:

(1) Granting me compensatory damages in the amount of \$500,000 against each Defendant, jointly & severally.

(2) Granting me nominal damages and punitive damages in the amount of \$1,000,000 against each Defendant, jointly & severally.

(3) A preliminary and permanent injunction/injunctions ordering Defendants to cease their Retaliation/Discrimination/Intimidation/Coercion/Interference/etc. against me and fully honor my rights under the ADA appropriately.

(b) Under Title 2 (42 USC § 12131): Judgement against TDCJ-CID/O.I.G./LITMB/TBCJ, as follows:

(1) Granting me compensatory damages in the amount of \$500,000 against each Defendant, jointly & severally.

(2) Granting me nominal damages and punitive damages in the amount of \$1,000,000 against each Defendant, jointly & severally.

(3) A preliminary and permanent injunction/injunctions ordering Defendants to cease their Retaliation/Discrimination/Intimidation/Coercion/Interference/etc. against me and fully honor my rights under the ADA appropriately.

(c) Under Title 3 (42 USC § 12181): Judgement against LITMB as follows:

(1) Granting me compensatory damages in the amount of \$500,000 against Defendant.

(2) Granting me nominal damages and punitive damages in the amount of \$1,000,000 against Defendant.

(3) A preliminary and permanent injunction/injunctions ordering Defendants to cease their Retaliation/Discrimination/Intimidation/Coercion/Interference/etc. against me and fully honor my rights under the ADA appropriately.

151 Under my LEGAL CLAIMS in regards to "Section 147" of this Complaint, I pray for Relief under "42 USC § 1983 (Section 1983)" and as "Section 147" of my LEGAL CLAIMS contains "subsections (a)-(f)" that each represent an individual LEGAL CLAIM, so shall this "Section 151" also contain subsections (a)-(f) that will request Relief in congruence with those subsections of "Section 147" of this.

Complaint as follows.

(a) In regards to "Section 147(a)" of this Complaint: Judgement against Defendants there-in as follows:

- (1) Granting me compensatory damages in the amount of \$250,000 against each Defendant severally and \$1,000,000 jointly.
- (2) Granting me nominal damages and punitive damages in the amount of \$250,000 against each Defendant severally and \$1,000,000 jointly.
- (3) A preliminary and permanent injunction/injunctions ordering: Defendants to Stop Obstructing Justice for the Crimes committed against me/ Defendants who Obstructed Justice personally, to be restrained from me in any form or fashion/ Defendants to honor my Victims' Rights/etc.

(b) In regards to "Section 147(b)" of this Complaint: Judgement against Defendants there-in as follows:

- (1) Granting me compensatory damages in the amount of \$250,000 against each Defendant severally and \$1,000,000 jointly.
- (2) Granting me nominal damages and punitive damages in the amount of \$250,000 against each Defendant severally and \$1,000,000 jointly.
- (3) A preliminary and permanent injunction/injunctions ordering: Defendants to be restrained from me in any form or fashion/ A re-investigation of the full facts done properly regarding the Criminal Charge against me revealed in "Section 133" of this Complaint by qualified personnel under this Court's purview and/or Federal Oversight and/or Dismissal of said Criminal Charge/ Defendants restrained from any investigations that relate to possible Criminal Law violations that relate to any Liberty Interest under Law/ Defendants to be investigated for any violations of Federal Criminal Law relative to the FACTS of this Complaint/etc.

(c) In regards to "Section 147(c)" of this Complaint: Judgement against Defendants there-in as follows:

- (1) Granting me compensatory damages in the amount of \$200,000 against each Defendant severally and \$1,000,000 jointly. 2

(2) Granting me nominal damages and punitive damages in the amount of \$300,000 against each Defendant severally and \$2,000,000 jointly.

(3) A preliminary and permanent injunction/injunctions ordering: Defendants to be restrained from me in any form or fashion / A Full scale Criminal Investigation into these Defendants' crimes against me and prosecution of those crimes to the fullest extent of the Law / Defendants to be restrained from my Family & Friends in any form or fashion / That I be taken into Federal Custody for my safety / That all my property be taken into Federal Custody with me / That no more TDCJ-CID Officials & Staff commit crimes against me of any kind / etc.

(d) In regards to "Section 147(d)" of this Complaint: Judgement against Defendants there-in as follows:

(1) Granting me compensatory damages in the amount of \$300,000 against each Defendant severally and \$2,000,000 jointly.

(2) Granting me nominal damages and punitive damages in the amount of \$300,000 against each Defendant severally and \$2,000,000 jointly.

(3) A preliminary and permanent injunction/injunctions ordering: Defendants to be restrained from me in any form or fashion / TDCJ-CID & LITMB Officials & Staff to cease any interference with my Serious Medical Needs and for them to always give me very adequate medical care / That I be taken into Federal Custody with all my property for my safety and so all my Serious Medical Needs can be taken care of properly / Full Physical & Mental Examinations of me done properly under Federal purview and/or with Federal Oversight / That I be transferred with all my property, to a Medical Facility under Federal purview & oversight / A Full scale Criminal Investigation into these Defendants' crimes against me and prosecution of those crimes to the fullest extent of the Law / That any transportation used to transfer me at any time be clean and very comfortable to accommodate my disabilities & injuries / etc.

(e) In regards to "Section 147(e)" of this Complaint: Judgement against Defendants there-in as follows:

(1) Granting me compensatory damages in the amount of \$300,000 against each Defendant severally and \$2,000,000 jointly.

(2) Granting me nominal damages and punitive damages in the amount of \$300,000 against each Defendant severally and \$2,000,000 jointly.

(3) A preliminary and permanent injunction/injunctions ordering: Defendants to be restrained from me in any form or fashion / Defendants to cease any Retaliation & Harassment against me in any form or fashion / That I be taken into Federal Custody with all my property for my safety & health / A full scale Criminal Investigation into these Defendants' crimes against me and prosecution of those crimes to the fullest extent of the Law / Defendants to be restrained from my Family & Friends / Defendants to stop violating the Protected Conduct of Filing Grievances for me and other Incarcerated Persons throughout the TDCJ-CID Systemwide / Defendants to stop obstructing my mail coming or going / TBCJ & TDCJ-CID to bring their/the Grievance System up to Federal Standards, Procedures, Regulations, Codes, Rules, etc. Systemwide / TBCJ & TDCJ-CID to stop any Conspiracy Against the Rights of Incarcerated Persons (including myself) to Obstruct Justice For Crimes committed against Incarcerated Persons (including myself) by those individuals & entities working for/with them under color of Law/etc.

(f) In regards to "Section 147(f)" of this Complaint: Judgement against Defendants there-in as follows:

(1) Granting me compensatory damages in the amount of \$10,000 against each Defendant severally and \$100,000 jointly.

(2) Granting me nominal damages and punitive damages in the amount of \$20,000 against each Defendant severally and \$200,000 jointly.

(3) A preliminary and permanent injunction/injunctions ordering: TBCJ & TDCJ-CID to stop the use of Solitary Confinement in TDCJ-CID that contradicts both the "Nelson Mandela RULES" of the United Nations and the "Solitary Confinement Reform Act" under Federal Law / TBCJ & TDCJ-CID & OIG & UTMB; to cease their deliberate indifference to the training, supervision, discipline, and hiring of their employees; to adopt policies necessary to prevent constitutional violations; to fully respect the rights of Incarcerated Persons with a great emphasis on those with serious disabilities that are physical & mental in nature; with these injunctions in relation to the FACTS of this Complaint / Defendants to stop all violence towards me and other Incarcerated Persons with or without serious disabilities that is illegal, excessive, or unnecessary throughout the TDCJ-CID / Defendants to stop stealing my property and anyone else's property / Defendants to stop denying Incarcerated Persons their Victims?

Rights & Proper Medical Care after being subjected to any Uses Of Force by Staff of the TDCJ-CID that are illegal or excessive and/or that caused any injuries/ That TDCJ-CID & TBCJ shut down Michael Unit and Michael Unit 12 Building completely/ That TBCJ & TDCJ-CID shut down all Units & Facilities that are consistently understaffed Systemwide and release all of the most eligible Incarcerated Persons immediately/ TBCJ & TDCJ-CID to cease the Systematic ongoing torture of Incarcerated Persons Systemwide immediately/ Defendants to cease any Religious Discrimination against me & honor my Religious needs completely/ Defendants to save all Security Cameras Data for 2 years for possible litigation or criminal investigations/ TBCJ & TDCJ-CID to put all missing items mentioned in "Section 124" of this Complaint back in all Law Libraries in TDCJ-CID/ Defendants to release me from their Custody/ That I be taken into Federal Custody with all my property for my safety & health/ etc.

152.) Under my LEGAL CLAIMS in regards to "Section 148" of this Complaint, I pray for Relief under 42 USC Section 1985 & 1986 as follows:

(a) In regards to "Section 148" of this Complaint: Judgement against all Defendants there-in as follows:

(1) Granting me compensatory damages in the amount of \$300,000 against each Defendant severally and \$2,000,000 jointly.

(2) Granting me nominal damages and punitive damages in the amount of \$300,000 against each Defendant severally and \$2,000,000 jointly,

(3) A preliminary and permanent injunction/ injunctions ordering: Defendants to be restrained from me in any form or fashion/ Defendants to cease the Conspiracy Against my Rights/ That Defendants of Authority release me from their Custody immediately/ That I be taken into Federal Custody with all my property for my safety & health/ etc.

153.) A declaration that the acts and omissions described herein violated my rights under the Constitution and Laws of the United States.

154.) A Jury Trial on all issues triable by Jury.

156.) My costs in this suit.

157.) Any additional relief this Court deems just, proper, and equitable.

Dated: January 1st, 2022

Respectfully submitted, Mr. Jamon Nathaniel Hestand; TDCJ-CID# 1343536
Michael Unit; 2664 FM 2054;
Tennessee Colony, TX 75886 USA

VERIFICATION

"I have read the foregoing complaint and hereby verify that the matters alleged therein are true, except as to matters alleged on information and belief, and, as to those, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

Executed On: January 1st, 2022

Jamon Nathaniel Hestand
Jamon Nathaniel Hestand

SSN: 450-83-6774

Born: April 27th, 1981 "